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Via ECF

April 18, 2022

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570
(GBD) (SN); *Estate of John Patrick O'Neill, Sr., et al., v. The*
Republic of Iraq, et al., 04-CV-1076 (GBD) (SN)

Dear Judge Netburn:

I write to inform the Court of our anticipated procedure to move for judgments against the Taliban for approximately 2,900 clients. As the Court is aware, on February 11, 2022, undersigned counsel moved to add parties to the above-captioned matter, solely against defendant the Taliban, rather than file a new complaint. *See* ECF No. 7654. Should the Court grant the motion, we would quickly move for judgments for these newly added parties against the Taliban, in accordance with Your Honor's April 11, 2022 Order regarding information to include in judgment motion papers, *see* ECF No. 7870, and similar to the judgment motion papers submitted by our co-counsel.

We intend to submit three judgment motions to the Court. The first motion would include the vast majority of added plaintiffs (approximately 2,450 of the approximately 2,900 total). The motion would include those who have already obtained monetary judgments against The Islamic Republic of Iran ("Iran"). We would request that the Court extend those damages judgments to the Taliban jointly and severally. The second motion would include 49 plaintiffs with pending motions for judgments against Iran. *See* Motion for Partial Final Judgment for Damages Against Iran, dated January 7, 2022, ECF No. 7571; *see also* Motion for Partial Final Judgment for Damages Against Iran, dated January 13, 2022, ECF No. 7589. The third motion would include added plaintiffs with no damages judgment or damages judgment motion pending against Iran, largely consisting of new clients and non-U.S. citizens.¹ We would only move for those clients who satisfy the Court's due diligence requirements as set forth in ECF Nos. 3433 and 3435 and would include a declaration from the undersigned as we have done for our judgment motions against Iran.

¹ We presently intend to cease accepting new 9/11 clients at the end of the spring.

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In other respects, we anticipate that the judgment motion papers will follow the format of our prior judgment motions against Iran and the Taliban (for the O'Neill family). *See* Motion for Partial Final Judgment for Damages Against the Taliban, dated February 11, 2022, ECF No. 7652; *see also* Motion for Entry of Default Judgment Solely as to Liability Against the Publication Defendants (including the Taliban), dated September 18, 2015, ECF No. 3042.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

Attorney for the Plaintiffs

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)